



IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA

v.

SHANLIN JIN

§
§
§
§
§

No. 4:21CR 48

INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

Count One

Violation: 18 U.S.C. §§ 2252A(a)(2)(A)
and (b)(1) (Receipt of Child
Pornography)

On or about December 14, 2020, in the Eastern District of Texas, **Shanlin Jin**, defendant, did knowingly receive any child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been shipped and transported using any means and facility of interstate and foreign commerce, and that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer. Specifically, the defendant, **Shanlin Jin**, using a peer-to-peer file sharing network, the Internet, and electronic devices that he owned and possessed, received the following visual depictions:

FILE NAME	DESCRIPTION
pthc cum over babygirl 5yo.mpg	This 1-minute, 20-second video depicts a prepubescent toddler female being vaginally penetrated by an adult male's penis. The adult male then uses the child's hand to masturbate and ejaculates on the child.
0010.avi	This 18-minute, 50-second video depicts a prepubescent female whose anus and vagina are digitally penetrated by an adult male. The male then vaginally penetrates the child with his penis.

In violation of 18 U.S.C. §§ 2252A(a)(2)(A) and (b)(1).

Count Two

Violation: 18 U.S.C. §§ 2252A(a)(2)(A) and (b)(1) (Distribution of Child Pornography)

On or about December 24, 2020, in the Eastern District of Texas, **Shanlin Jin**, defendant, did knowingly distribute any child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been shipped and transported using any means and facility of interstate and foreign commerce, and that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer. Specifically, the defendant, **Shanlin Jin**, using a peer-to-peer file sharing network, the Internet, and electronic devices that he owned and possessed, distributed the following visual depictions:

FILE NAME	DESCRIPTION
!!!!NEWBABY [REDACTED] 1.mp4	This 55-second video depicts a prepubescent female whose vagina is penetrated by an adult male's penis.

FILE NAME	DESCRIPTION
'004.mp4	This 52-second video depicts a prepubescent female spreading her legs to expose her vagina, which is the focus of the recording. The child then performs oral sex on an adult male's penis.

In violation of 18 U.S.C. §§ 2252A(a)(2)(A) and (b)(1).

Count Three

Violation: 18 U.S.C. §§ 2252A(a)(5)(B)
and (b)(2) (Possession of Child
Pornography)

On or about January 12, 2021, in the Eastern District of Texas, **Shanlin Jin**, defendant, did knowingly possess material, namely, an Alienware desktop computer bearing service tag number 99FF4Z2, that contained images of child pornography, as defined in Title 18, United States Code, Section 2256(8), involving a prepubescent minor and a minor who had not attained 12 years of age, that had been shipped and transported using any means and facility of interstate and foreign commerce; that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer; and that had been produced using materials that had been mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer. Included among the images and videos that the defendant, **Shanlin Jin**, possessed were the following:

FILE NAME	DESCRIPTION
██████████(466).avi	This 2-minute, 6-second video depicts a prepubescent female blindfolded and lying nude on her back while a dog licks her vagina. An adult male then places his penis in the female's mouth and digitally

	penetrates her vagina.
B305066.avi	This 3-minute, 40-second video depicts an adult female performing oral sex on a prepubescent toddler female and inserts a foreign object into the child's vagina.
3岁小女孩磨阴.rm	This 6-minute, 41-second video depicts an adult male vaginally and anally penetrating a prepubescent toddler female with his penis. The child also performs oral sex on the adult male.
■■■■hff2.wmv	This 48-minute, 58-second video is a compilation depicting multiple prepubescent females being vaginally and anally penetrated by the penises of adult males.

In violation of 18 U.S.C. § 2252A(a)(5)(B) and (b)(2).

NOTICE OF INTENTION TO SEEK CRIMINAL FORFEITURE

Upon conviction of the offense(s) alleged in this Indictment, the defendant, **Shanlin Jin**, shall forfeit to the United States his interest in the following property, including, but not limited to:

1. Alienware desktop computer, bearing service tag # 99FF4Z2;
2. Samsung 1TB solid state drive, bearing serial number S599NE0M8284712;
3. Toshiba 1024GB NVMe storage device, bearing serial number 79PA21RXK6CN;
4. Western Digital 6TB hard drive, bearing serial number V8HJK6VR; and
5. Samsung 250GB solid state drive, bearing serial number S3YHNGAJC09887T.

This property is forfeitable pursuant to 18 U.S.C. § 2253(a) based upon the property being:

- (1) any visual depiction described in section . . . 2252 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of this chapter;
- (2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; or
- (3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense.


By virtue of the commission of the offense alleged in this Indictment, any and all interest the defendant has in this property is vested in and forfeited to the United States pursuant to 18 U.S.C. §§ 2253(a)(1) and (a)(3).

A TRUE BILL

MCF

GRAND JURY FOREPERSON

NICHOLAS J. GANJEI
ACTING UNITED STATES ATTORNEY


MARISA J. MILLER
Assistant United States Attorney

Date: 2/24/21

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	§	Judge
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NOTICE OF PENALTY

Counts One and Two

Violation: 18 U.S.C. §§ 2252A(a)(2)(A) and (b)(1)

Penalty: Imprisonment for not less than five years and not more than twenty years; but if the defendant has a prior conviction under this chapter, section 1591, chapter 71, chapter 109A, chapter 117, or under section 920 of title 10 (article 120 of the Uniform Code of Military Justice), or under the laws of any State relating to aggravated sexual abuse, sexual abuse, or abusive sexual conduct involving a minor or ward, or the production, possession, receipt, mailing, sale, distribution, shipment, or transportation of child pornography or sex trafficking of children, such person shall be imprisoned for not less than fifteen years and not more than forty years; a fine of not more than \$250,000; and a term of supervised release of not less than five years to life.

Special Assessment: \$ 100.00

JVTA Assessment: \$ 5000.00

Count Three

Violation: 18 U.S.C. §§ 2252A(a)(5)(B) and (b)(2)

Penalty: Imprisonment for not more than ten years; but if any image of child pornography involved in the offense involved a prepubescent minor or a minor who had not attained 12 years of age, such person shall be imprisoned for not more than twenty years; and, if the defendant has a prior conviction

under this chapter, section 1591, chapter 71, chapter 109A, chapter 117, or under section 920 of title 10 (article 120 of the Uniform Code of Military Justice), or under the laws of any State relating to aggravated sexual abuse, sexual abuse, or abusive sexual conduct involving a minor or ward, or the production, possession, receipt, mailing, sale, distribution, shipment, or transportation of child pornography or sex trafficking of children, such person shall be imprisoned for not less than ten years and not more than twenty years; a fine of not more than \$250,000; and a term of supervised release of not less than five years to life.

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